

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF WYOMING

STEPHANIE WADSWORTH,
individually and as parent and legal
guardian of W.W., K.W., G.W., and L.W.,
minor children, and MATTHEW
WADSWORTH,

Plaintiffs,

vs.

WALMART INC. and JETSON
ELECTRIC BIKES, LLC,

Defendants.

Case No. 2:23-CV-118-KHR

**ATTACHMENT A: PLAINTIFFS' TRIAL EXHIBIT LIST WITH
DEFENDANTS' OBJECTIONS**

Ex. No.	Document Description	File Name	Objections	Category A, B, C	Offered	Admit/ Not Admitted (A)-(NA)
1.	PHOTOS: Before Photos of Wadsworth Family		Possible cumulative Rule 403.	B		
2.	PHOTOS/VIDEOS: Subject Hoverboard prior to 2/1/22		Possible cumulative Rule 403.	B		
3.	PHOTOS: Injury Photos of Stephanie Wadsworth		Possible cumulative Rule 403.	B		
4.	PHOTOS: Injury Photos of WW		Possible cumulative Rule 403.	B		

Ex. No.	Document Description	File Name	Objections	Category A, B, C	Offered	Admit/ Not Admitted (A)-(NA)
5.	PHOTOS: After Photos of Wadsworth Family		Possible cumulative Rule 403.	B		
6.	RECS: SW Castle Rock Ambulance 2/1/22			A		
7.	RECS: SW Memorial Hospital of Sweetwater 2/1/22			A		
8.	RECS: SW AirMed Utah 2/1/22			A		
9.	RECS: SW University of Utah Hospital Admission 2/1/22-3/21/22			A		
10.	RECS: SW UH Hospitals and Clinics 3/28/22-8/6/24			A		
11.	RECS: SW High Plains Physical Therapy 3/24/22-9/28/22			A		
12.	RECS: SW Rock Springs Plastic Surgery Center			A		
13.	RECS: SW Castle Rock Medical Center			A		
14.	RECS: SW Desert Eye Care			A		
15.	RECS: WW Castle Rock Ambulance 2/1/22			A		
16.	RECS: WW Memorial Hospital of Sweetwater 2/1/22			A		
17.	RECS: WW AirMed Utah 2/1/22			A		
18.	RECS: WW University of Utah Hospital Admission 2/1/22-2/27/22			A		
19.	RECS: WW UH Hospitals and Clinics 3/7/22-8/6/24			A		
20.	RECS: WW Professional Counseling Services			A		
21.	Medical Bills Summary for SW		Rule 802.	B		
22.	Medical Bills Summary for WW		Rule 802.	B		
23.	BILLS: SW Composite Medical Bills		Potentially Rule 403 and Rule 802.	B		
24.	BILLS: WW Composite Medical Bills		Potentially Rule 403 and Rule 802.	B		
25.	AUDIO: 911 Call 2/1/22		Rule 802.	B		
26.	Sweetwater County Sheriff's Office Incident Report 2/1/22		Rule 802, Sheaman	B		

Ex. No.	Document Description	File Name	Objections	Category A, B, C	Offered	Admit/ Not Admitted (A)-(NA)
			cause and order opinion not admissible per Court Order (Doc. 143).			
27.	Sweetwater County Call Detail Report 2/1/22		Rule 802.	B		
28.	Sweetwater County Fire District #1 Incident Report		Rule 802.	B		
29.	City of Green River Fire Department Incident Report		Rule 802, Robinson cause and order opinion not admissible per Court Order (Doc. 143).	B		
30.	PHOTOS: Scene Photos taken by Sweetwater County Sheriff's Office on 2/1/22		Possible cumulative Rule 403.	B		
31.	PHOTOS: Scene Photos taken by Green River Fire Department on 2/1/22		Possible cumulative Rule 403.	B		
32.	VIDEO: SCSO Body Cam 1620 HWY 374			A		
33.	VIDEO: SCSO Body Cam 1620_HWY_374-2			A		
34.	VIDEO: SCSO Body Cam Fire; 1620_HWY_374			A		
35.	VIDEO: SCSO Body Cam Fire; 1620_HWY_374-2			A		
36.	VIDEO: SCSO Body Cam Fire_1620_HWY_374			A		
37.	VIDEO: WHP ASSIST CRASH HWY_374			A		
38.	VIDEO: WHP ASSIST CRASH HWY_374-2			A		
39.	VIDEO: Det. Sheaman Interview with Ryan Pasborg 2/1/22		Rule 403, Rule 802, Portions that reference Sheaman cause and origin	B		

Ex. No.	Document Description	File Name	Objections	Category A, B, C	Offered	Admit/ Not Admitted (A)-(NA)
			opinion not admissible per Court Order (Doc. 143).			
40.	AUDIO: Det. Sheaman Phone interview with Matt Wadsworth 2/2/22		Rule 403, Rule 802, Portions that reference Sheaman cause and origin opinion not admissible per Court Order (Doc. 143).	B		
41.	VIDEO: Det. Sheaman Interview with Wadsworth family (view 1) 3/4/22		Rule 403, Rule 802, Portions that reference Sheaman cause and origin opinion not admissible per Court Order (Doc. 143).	B		

Ex. No.	Document Description	File Name	Objections	Category A, B, C	Offered	Admit/ Not Admitted (A)-(NA)
42.	VIDEO: Det. Sheaman Interview with Wadsworth family (view 2) 3/4/22		Rule 403, Rule 802, Portions that reference Sheaman cause and origin opinion not admissible per Court Order (Doc. 143).	B		
43.	All Evidence Collected by Det. Sheaman including: a. Photo of Wadsworth Home from Realtor.com b. Photo of Walmart Price Tag for Jetson Plasma IRS Hoverboard taken 2/3/22 c. Photo of Walmart UPC Device Scan of Jetson Plasma IRS Hoverboard on Sale as of 2/3/22 d. Screenshot of White Jetson Plasma Hoverboard e. Photo of Wadsworth Kids unwrapping Subject Hoverboard on 12/25/21 f. Drawing/Diagram of Wadsworth Home		Rule 403, Rule 802 Defendants reserve the right to raise additional objections as it is unclear as to whether this is complete list under this category.	B		
44.	IC Specialty Services Artifact Evidence Logs			A		
45.	Matterport Floor Plans and Diagrams of Wadsworth Home			A		
46.	Matterport 3D Scan of Wadsworth Home			A		
47.	Subject Jetson Plasma Hoverboard Walmart Purchase Receipt on 12/12/21			A		

Ex. No.	Document Description	File Name	Objections	Category A, B, C	Offered	Admit/ Not Admitted (A)-(NA)
48.	Physical Evidence: Subject Jetson Plasma Hoverboard			A		
49.	Physical Evidence: Exemplar Jetson Plasma Hoverboards		Rule 401, Rule 403, unreliable exemplar, Rule 702, Rule 901.	B, C		
50.	Physical Evidence: Exemplar Jetson Rogue Hoverboards		Rule 401, Rule 403, unreliable exemplar, Rule 702, Rule 901.	B, C		
51.	Physical Evidence: Exemplar Jetson Hoverboards		Rule 401, Rule 403, unreliable exemplar, Rule 702, Rule 901.	B, C		
52.	Physical Evidence: All Debris and Evidence Collected from Wadsworth Home		Unknown as to what debris. Possible Rule 401, Rule 403.	B		
53.	Physical Evidence: Exemplar Cigarette Pack and lighter		Rule 401, Rule 403, unreliable exemplar, Rule 702, Rule 901.	B, C		
54.	Physical Evidence: Exemplar Eagle 1649 Outdoor Storage Shed		Reserve objections pending counsel review.	A, B, C		
55.	Physical Evidence: Exemplar Comfort Zone Electric Shop Heater		Rule 401, Rule 403, unreliable exemplar, Rule 702,	B, C		

Ex. No.	Document Description	File Name	Objections	Category A, B, C	Offered	Admit/ Not Admitted (A)-(NA)
			Rule 901.			
56.	Physical Evidence: Exemplar Battery Packs		Rule 401, Rule 403, unreliable exemplar, Rule 702, Rule 901.	B, C		
57.	PHOTOS: Wadsworth Home Prior to 2/1/22 from Realtor.com		Rule 403 cumulative to Ex. 43.	B		
58.	PHOTOS: Wadsworth Home taken by Michael Schulz on 5/18/22		Possible cumulative Rule 403.	B		
59.	PHOTOS: Schulz Expert Report Photos		Possible cumulative Rule 403.	B		
60.	PHOTOS: Schulz All Evidence Photos		Possible cumulative Rule 403.	B		
61.	Schulz Case Notes and References		Rule 401, Rule 403, Rule 802.	B		
62.	PHOTOS: Subject Hoverboard X-Rays 7/26/22			A		
63.	PHOTOS: Wadsworth Home taken by ESI Daren Slee on 8/2/22		Rule 403, Rule 602, Rule 901	B, C		
64.	PHOTOS: Wadsworth Home taken by ATB on 8/1/22		Rule 403, Rule 602, Rule 901	B, C		
65.	PHOTOS: Wadsworth Home taken by ATB on 8/2/22		Rule 403, Rule 602, Rule 901	B, C		
66.	PHOTOS: Wadsworth Home taken by ATB on 8/3/22		Rule 403, Rule 602, Rule 901	B, C		
67.	PHOTOS: Wadsworth Home from Raymona Nuttall		Possible cumulative Rule 403	C		
68.	PHOTOS: Google Earth Images of Wadsworth Home		Rule 401, cumulative	B		

Ex. No.	Document Description	File Name	Objections	Category A, B, C	Offered	Admit/ Not Admitted (A)-(NA)
			Rule 403.			
69.	PHOTOS: X-Ray Images of Subject Hoverboard		No objection to some, but reserve potential cumulative Rule 403.	B		
70.	PHOTOS: CT Scan Images of Subject Hoverboard		No objection to some, but reserve potential cumulative Rule 403.	B		
71.	PHOTOS: King Subject Hoverboard taken 10/23/23		No objection to some, but reserve potential cumulative Rule 403.	B		
72.	PHOTOS: King Subject Hoverboard taken 2/29/24		No objection to some, but reserve potential cumulative Rule 403.	B		
73.	PHOTOS: King Exemplar Jetson Plasma X taken 3/12/24		Rule 401, Rule 403.	B		
74.	PHOTOS: King Exemplar Jetson Plasma taken 3/26/24		No objection to some, but reserve potential cumulative Rule 403.	B		
75.	PHOTOS: King Exemplar Plasma X Disassembly taken 3/13/24		Rule 401, Rule 403.	B		
76.	PHOTOS: King Exemplar Jetson Plasma		No	B		

Ex. No.	Document Description	File Name	Objections	Category A, B, C	Offered	Admit/ Not Admitted (A)-(NA)
	Disassembly taken 4/26/24		objection to some, but reserve potential cumulative Rule 403.			
77.	PHOTOS: King Comparison for Trial: Exemplar Jetson Plasma vs. Subject Hoverboard		No objection to some, but reserve potential cumulative Rule 403.	B		
78.	PHOTOS: King Comparison for Trial: Exemplar Jetson Plasma X vs. Subject Hoverboard		Rule 401, Rule 403.	B		
79.	PHOTOS: King Evidence Photos for Trial		No objection to some, but reserve potential cumulative Rule 403.	B		
80.	PHOTOS: King Expert Report Photos		No objection to some, but reserve potential cumulative Rule 403.	B		
81.	PHOTOS: King All Evidence Photos		No objection to some, but reserve potential cumulative Rule 403.	B		
82.	King Case Notes and References		Rule 403, Rule 802.	B		
83.	PHOTOS: X-Ray Images of Subject Hoverboard taken 10/30/23 & 10/31/23		No objection to some, but reserve	B		

Ex. No.	Document Description	File Name	Objections	Category A, B, C	Offered	Admit/ Not Admitted (A)-(NA)
			potential cumulative Rule 403.			
84.	PHOTOS: Dyer Subject Evidence taken 10/30/23		Rule 401, Rule 403, Rule 802, Rule 901.	B, C		
85.	PHOTOS: Dyer Subject Evidence taken 10/31/23		Rule 401, Rule 403, Rule 802, Rule 901.	B, C		
86.	PHOTOS: Sudler Subject Evidence taken 10/30/23			A		
87.	PHOTOS: Sudler Subject Evidence taken 10/31/23			A		
88.	PHOTOS: Sudler Subject Hoverboard taken 2/29/24			A		
89.	PHOTOS: Sudler Subject Hoverboard CT Scan Images and Measurements			A		
90.	PHOTOS: Sudler Expert Report Photos			A		
91.	PHOTOS: Gorbett Fire Test 5/31/24			A		
92.	PHOTOS: Gorbett Expert Report Photos			A		
93.	PHOTOS: Gorbett All Evidence Photos			A		
94.	VIDEOS: Gorbett Testing Videos			A		
95.	Gorbett CFD Simulations			A		
96.	Gorbett Case Notes and References			A		
97.	PHOTOS: Strandjord Wadsworth Home taken 5/18/22			A		
98.	PHOTOS: Strandjord Wadsworth Home taken 8/2/22			A		
99.	PHOTOS: Strandjord Wadsworth Home taken 8/3/22			A		
100.	PHOTOS: Strandjord Subject Evidence taken 10/30/23			A		
101.	PHOTOS: Strandjord Subject Evidence taken 10/31/23			A		
102.	PHOTOS: Strandjord Expert Report Photos			A		
103.	PHOTOS: Strandjord All Evidence Photos			A		

Ex. No.	Document Description	File Name	Objections	Category A, B, C	Offered	Admit/ Not Admitted (A)-(NA)
104.	Strandjord Case Notes and References			A		
105.	PHOTOS: Filas Microscope Images of Subject Hoverboard			A		
106.	PHOTOS: Filas Wadsworth Home taken 5/18/22			A		
107.	PHOTOS: Filas Wadsworth Home taken 8/2/22			A		
108.	PHOTOS: Filas Subject Evidence taken 10/30/23			A		
109.	PHOTOS: Filas Subject Evidence taken 10/31/23			A		
110.	PHOTOS: Filas Expert Report Photos			A		
111.	PHOTOS: Filas All Evidence Photos			A		
112.	Filas Case Notes and References			A		
113.	PHOTO: Fire Chief Robinson Annotated Photo of Wadsworth Home from		Rule 802.	B		
114.	PHOTO: Matthew Wadsworth Annotated Hand Drawn Diagram of Wadsworth Home		Rule 802.	B		
115.	Rule 26 Expert Report of Michael Schulz		Rule 802.	B		
116.	Rule 26 Expert Report of Derek King		Rule 802.	B		
117.	Rule 26 Expert Report of Ronald Snyder, MD		Rule 802.	B		
118.	Rule 26 Expert Report of Joseph Filas			A		
119.	Rule 26 Expert Report of Greg Gorbett			A		
120.	Rule 26 Expert Report of Sam Sudler			A		
121.	Rule 26 Expert Report of Brian Strandjord			A		
122.	Rule 26 Expert Report of Cloie B. Johnson, M.Ed.			A		
123.	Rule 26 Expert Report of Charity Rowsey, CPA			A		

Ex. No.	Document Description	File Name	Objections	Category A, B, C	Offered	Admit/ Not Admitted (A)-(NA)
124.	Applicable Mortality Tables		Reserve potential objection until counsel can review the proposed tables.	Reserve B, C		
125.	Jetson Website Plasma Luminous All-Terrain Hoverboard		Rule 403, Rule 802.	B		
126.	Jetson Exemplar Plasma Labels		Reserve potential objection until counsel can review the proposed exemplar.	Reserve B		
127.	Jetson Recall Notice for Rogue All-Terrain Hoverboard		Rule 401, Rule 403, Rule 802, and pending motion <i>in limine</i> .	B		

Ex. No.	Document Description	File Name	Objections	Category A, B, C	Offered	Admit/ Not Admitted (A)-(NA)
128.	Jetson Plasma Product Manual 08/2020			A		
129.	Jetson Rogue Product Manual		Rule 401, Rule 403 and pending motion <i>in limine</i> .	B		
130.	Jetson Strike Product Manual		Rule 401, Rule 403 and same reasons related to pending motion <i>in limine</i> on the Rogue model.	B		
131.	Jetson Plasma X Product Manual		Rule 401, Rule 403 and same reasons related to pending motion <i>in limine</i> on the Rogue model.	B		
132.	Jetson Glyro Product Manual		Rule 401, Rule 403 and same reasons related to pending motion <i>in limine</i> on the Rogue model.	B		

Ex. No.	Document Description	File Name	Objections	Category A, B, C	Offered	Admit/ Not Admitted (A)-(NA)
133.	Jetson Hoverboard Product Manuals 2016-2024		Rule 401, Rule 403. Unknown what this is specifically. Reserve all other potential objections.	B		
134.	Jetson Hoverboard Website Archives 2018-2024		Unknown what this is specifically. Reserve all other potential objections.	Reserve A, B, C		
135.	Jetson Plasma Product Manual 10/2021 (JETSON0001-21)			A		
136.	Jetson Plasma Product Labels 2/26/20 (JETSON0571-573)			A		
137.	Jetson JPLSM-IRS Box Labeling & Packaging 1/14/21 (JETSON0518-521)			A		
138.	Jetson Plasma Rating & Warning Labels 5/10/21 (JETSON0022-23)			A		
139.	Jetson Plasma CP4210 Charger Labels 6/22/20 (JETSON0024-25)			A		
140.	Jetson Testcoo Category QA Checks & Standards 2021 Protocol Additions (JETSON0564-570)			A		
141.	Jetson Master Supply Agreement (JETSON0522-526)		Rule 401, Rule 403.	B		
142.	Jetson & Walmart Supplier Agreement 6/27/17 (JETSON0626-638)		Rule 401, Rule 403.	B		
143.	Jetson Warranty Policy		Rule 401,	B		

Ex. No.	Document Description	File Name	Objections	Category A, B, C	Offered	Admit/ Not Admitted (A)-(NA)
	(JETSON0639-642)		Rule 403. Refer to Defendants Summary Judgment motion on warranty claim.			
144.	Jetson Report on Component Batteries for Use in Electric Scooters ELITOP-1001U-JD Rev. 5/21/20 (JETSON0553-563)			A		
145.	Jetson UL2271 Report on Component Batteries Model HY18650 2/09/18 (JETSON0527-552)		Rule 401, Rule 403.	B		
146.	Jetson UL2271 Report on Component Batteries ELITOP-1001UL-HY 11/2/20 (JETSON0248-310)		Rule 401, Rule 403.	B		
147.	Jetson UL2271 Report on Component Batteries ELITOP-1001U-JD Rev. 5/21/21 (JETSON0990-1000)			A		
148.	Jetson UL2850 Report on Component Batteries Cells Model No. INR1865P 8/7/19 (JETSON0311-321)			A		
149.	Jetson UL2272 Plasma Test Records 6/13/20 (JETSON0322-332)			A		
150.	Jetson UL2272 Certificate of Compliance for Plasma+Sync 7/22/21 (JETSON0574-575)			A		
151.	Jetson UL2272 Certificate of Compliance 10/15/21 (JETSON0333-334)		Rule 403.	B		
152.	Jetson UL2272 Report for PlasmaX+Mojo+Prism Rev. 6/13/22 (JETSON0341-491)		Rule 403.	B		
153.	Jetson UL2272 Report for Plasma+Sync Rev. 7/19/21		Rule 403.	B		

Ex. No.	Document Description	File Name	Objections	Category A, B, C	Offered	Admit/ Not Admitted (A)-(NA)
	(JETSON0576-599)					
154.	Jetson UL2272 Report for LithoX+JBEAT+Zone Rev. 9/6/21 (JETSON0600-623)		Rule 403.	B		
155.	Jetson UL Multiple Listing Correlation Sheet (JETSON0335-336)		Rule 403.	B		
156.	Jetson UL Follow up Service Procedure Rev. 1/21/22 (JETSON0337-340)		Rule 401, Rule 403.	B		
157.	Jetson UN38.3 Test Report ELITOP-1001U-JD 6/02/20 (JETSON0978-989)			A		
158.	Jetson UN38.3 Test Summary ELITOP-1001U-JD 6/5/20 (JETSON0976-977)			A		
159.	Jetson UN38.3 Test Report ELITOP-1001UL-HY 10/20/20 (JETSON0506-517)		Rule 401, Rule 403.	B		
160.	Jetson UN38.3 Test Summary ELITOP-1001UL-HY 10/27/20 (JETSON0793-794)		Rule 401, Rule 403.	B		
161.	Jetson Certificate of Safe Transport by Air for Battery Pack ELITOP-1001U-JD 1/1/21 (JETSON0968-971)		Rule 401, Rule 403.	B		
162.	Jetson Certificate of Safe Transport by Sea for Battery Pack ELITOP-1001U-JD 1/1/21 (JETSON972-975)		Rule 401, Rule 403.	B		
163.	Jetson Certificate of Safe Transport by Sea for Battery Pack ELITOP-1001UL-HY 1/1/21 (JETSON0492-495)		Rule 401, Rule 403.	B		
164.	Jetson MSDS ELITOP-1001UL-HY 1/1/21 (JETSON0496-505)		Rule 401, Rule 403.	B		

Ex. No.	Document Description	File Name	Objections	Category A, B, C	Offered	Admit/ Not Admitted (A)-(NA)
165.	Jetson MSDS ELITOP-1001U-JD 01/1/21 (JETSON01001-1009)			A		
166.	Jetson Responses to Plaintiffs' First Request for Admissions			A		
167.	Jetson Responses to Plaintiffs' First Set of Interrogatories			A		
168.	Jetson Responses to Plaintiffs' First Request for Production			A		
169.	Walmart Jetson Plasma Hoverboard Performance Testing 10/16/20			A		
170.	Walmart Global Consumer Protection Policy 1/04/21			A		
171.	Walmart Safe & Compliant Product Policy 3/30/20			A		
172.	Walmart Global Product Safety Compliance 1/4/21		Rule 401, Rule 402	B		
173.	Walmart Global Responsible Sourcing Compliance Policy 1/4/21			A		
174.	Walmart Standards for Suppliers (Product Suppliers)			A		
175.	Walmart Audit & Assessment Policy and Guidance 04/21		Rule 401, Rule 403	B		
176.	Walmart Safe and Compliant Product Policy 6/27/16			A		
177.	Walmart Consumer Protection Policy 11/21/17			A		
178.	Walmart Global Product Safety & Compliance Policy 11/21/17			A		
179.	Walmart Standards for Suppliers			A		
180.	Walmart Responses to Plaintiffs' First Request to Produce			A		
181.	Rock Springs, Wyoming Historical Weather 2/1/22		Rule 401, Rule 602, Rule 702, Rule 901.	B, C		
182.	Comfort Zone Electric Shop Heater Identification		Defendants reserve the right to raise objections	Reserved A, B, C		

Ex. No.	Document Description	File Name	Objections	Category A, B, C	Offered	Admit/ Not Admitted (A)-(NA)
			following review of the proposed exhibit.			
183.	Eagle 1649 Outdoor Storage Specs		Defendants reserve the right to raise objections following review of the proposed exhibit.	Reserved A, B, C		
184.	UL 2271		Rule 401, Rule 403.	B		
185.	UL 2272			A		
186.	UL 2580			A		
187.	UL 2850		Rule 403, Rule 602, Rule 702, Rule 802.	B, C		
188.	UL 2272 and the Safety of Personal Mobility Devices		Rule 401, Rule 403, Rule 602, Rule 702, Rule 802, Rule 901.	B, C		
189.	UL Safety Issues for Lithium-Ion Batteries		Rule 401, Rule 403, Rule 602, Rule 702, Rule 802, Rule 901.	B, C		
190.	TC 2580 - Batteries for Use in Electric Vehicle		Rule 401, Rule 403, Rule 702, Rule 802.	B		
191.	Wyoming Reduced Cigarette Ignition Propensity Act		Rule 401, Rule 403.	B		

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192.	ASTM E2187-04		Rule 401, Rule 403.	B		
193.	New York State Fire Safety Standards for Cigarettes, New York Executive Law, Section 156-C, as amended, and Part 429 of Title 19 New York Codes		Rule 401, Rule 403, Rule 602, Rule 702.	B, C		
194.	RECS: KW Professional Counseling Services			A		
195.	RECS: GW Professional Counseling Services			A		
196.	RECS: LW Professional Counseling Services			A		
197.	CPSC Recall for Jetson Rogue		Rule 401, Rule 403, Rule 802 Rule 901.	B, C		
198.	CPSC Consumer Complaints for Jetson Hoverboards with all attachments and submittals		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
199.	CPSC Hoverboard Safety Alert 4/2018		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901, Pending motion <i>in limine</i> .	B, C		
200.	Jetson Hoverboard Consumer Complaints		Unknown what these are based on description. Potential Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
201.	Jetson Employee Redditt Posts and Comments Regarding Jetson Hoverboards		Unknown what these are based on	B, C		

Ex. No.	Document Description	File Name	Objections	Category A, B, C	Offered	Admit/ Not Admitted (A)-(NA)
			description. Potential Rule Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.			
202.	Jetson Social Media Posts Regarding Hoverboards and customer comments/posts		Unknown what these are based on description. Potential Rule Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
203.	Jetson Amazon Storefront Hoverboard Reviews and Comments		Rule 401, Rule 403, Rule 602, Rule 802 Rule 901.	B, C		
204.	Donwell Complaint		Rule 401, Rule 403, Rule 602, Rule 802, Pending motion <i>in limine</i> .	B, C		
205.	Donwell Fire Department report		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901, Pending motion <i>in limine</i> .	B, C		
206.	Kaufmann Complaint		Rule 401, Rule 403,	B, C		

Ex. No.	Document Description	File Name	Objections	Category A, B, C	Offered	Admit/ Not Admitted (A)-(NA)
			Rule 602, Rule 802, Pending motion <i>in limine</i> .			
207.	Kaufman - Jetson Motion for Leave to Add Third-Party Defendant Dongguan Asiwo Technology Co. Ltd. f/k/a E-Link Technology Co. Ltd.		Rule 401, Rule 403, Rule 602, Rule 802, Pending motion <i>in limine</i> .	B, C		
208.	53,000 hoverboards recalled over battery fire hazard after deaths of 2 sisters		Rule 401, Rule 403, Rule 602, Rule 802 Rule 901. Pending motion <i>in limine</i> .	B, C		
209.	U.S. Recalls 53,000 Hoverboards After Reports of Fires		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901. Pending motion <i>in limine</i> .	B, C		
210.	Jetson Electric Bikes Recalls 42-Volt Rogue Self-Balancing Scooters/Hoverboards Due to Fire Hazard; Two Deaths Reported		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
211.	PA Judge Approves \$38 Million Settlement in Hoverboard Fire		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
212.	Fire officials warn of dangers after 2 hoverboards on charger burn, catch fire in Chartiers Township		Rule 401, Rule 403, Rule 602, Rule 802,	B, C		

Ex. No.	Document Description	File Name	Objections	Category A, B, C	Offered	Admit/ Not Admitted (A)-(NA)
			Rule 901.			
213.	Florida Fire Marshal warns of Chinese made hoverboards with lithium batteries, they're "ticking time bombs"		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
214.	Update: Overheated hoverboard batteries ruled cause of Worcester fire		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
215.	Doorbell footage captures moment family flee after hoverboard charger burst into flames and destroyed home		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
216.	Electric hoverboard blamed for Balch Springs apartment fire that displaced more than 60		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
217.	Residents starting over after fire rips through Balch Springs apartment building		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
218.	Lithium-ion battery hazards spark fires, lawsuits		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
219.	Hoverboard caused Van Nuys house fire		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
220.	Exploding hoverboard battery fire leaves Smethwick mum in coma		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
221.	Hoverboard fire destroys Australia family's home		Rule 401,	B, C		

Ex. No.	Document Description	File Name	Objections	Category A, B, C	Offered	Admit/ Not Admitted (A)-(NA)
			Rule 403, Rule 602, Rule 802, Rule 901.			
222.	4-year-old girl dies following Harrisburg house fire		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
223.	7 displaced, cats saved after charging hoverboard triggers apartment fire, crews say		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
224.	Hoverboard battery sparks fire at Towson apartment building		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
225.	Hoverboard maker sued for \$200,000 after devices caught fire, burned Abington home		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
226.	Another hoverboard toy explodes in Louisiana, TV station says		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
227.	Firefighters learning new techniques to fight lithium-ion battery fires		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
228.	Nashville family sues Amazon after hoverboard fire destroys house		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
229.	Hoverboard Explodes, Destroying Family Home, Mom Says		Rule 401, Rule 403, Rule 602,	B, C		

Ex. No.	Document Description	File Name	Objections	Category A, B, C	Offered	Admit/ Not Admitted (A)-(NA)
			Rule 802, Rule 901.			
230.	A recharging hoverboard sparked a fire in a Pennsylvania home, killing a toddler		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
231.	Hoverboard likely sparked Santa Rosa house fire that killed dogs		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
232.	Footage shows charging hoverboard explode in Chicago area home		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
233.	Beverley mum tells how hoverboard battery fire destroyed family home		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
234.	Hoverboard 'plugged in for 10 minutes' causes fire that destroyed Melbourne home		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
235.	Hoverboard bursts into flames during user's first ride		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
236.	Hoverboard explosion caught on camera https://www.youtube.com/watch?v=DRdegWOmPt8		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
237.	Hoverboard Fire Caught on Camera and Batteries explode https://www.youtube.com/watch?v=PS_KLWMvFw4		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		

Ex. No.	Document Description	File Name	Objections	Category A, B, C	Offered	Admit/ Not Admitted (A)-(NA)
238.	Hoverboards Catching Fire, Exploding https://www.youtube.com/watch?v=xtvc3Jh_O0Y		Rule 401, Rule 403, Rule 802, Rule 901.	B, C		
239.	Hoverboard bursts into flames https://www.youtube.com/watch?v=4IBYkoMML3Y		Rule 401, Rule 403, Rule 802, Rule 901.	B, C		
240.	VIDEOS: Hoverboards Catching Fire		Rule 401, Rule 403, Rule 802, Rule 901.	B, C		
241.	VIDEOS: Lithium-Ion Batteries Catching Fire		Rule 401, Rule 403, Rule 802, Rule 901.	B, C		
242.	Jetson Hoverboard FCC Filings and Reports		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
243.	Demark v. Jetson Complaint, Answer, Incident Reports, Photographs		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
244.	Hottenstein v. Jetson Complaint, Answer, Incident Reports, Photographs		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
245.	Mendoza v. Jetson Complaint, Answer, Incident Reports, Photographs		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
246.	Reichley v. Jetson Complaint, Answer, and Incident Reports, Photographs		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
247.	NFPA 921			A		

Ex. No.	Document Description	File Name	Objections	Category A, B, C	Offered	Admit/ Not Admitted (A)-(NA)
248.	Doughty, D., & Roth, E. P. (2012). A General Discussion of Li Ion Battery Safety. <i>The Electrochemical Society Interface</i>		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
249.	Wang, Q., Ping, P., Zhao, X., Chu, G., Sun, J., & Chen, C. (2012). Thermal runaway caused fire and explosion of lithium ion battery. <i>Journal of Power Sources</i>		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
250.	Battery University – “Thermal Runaway”		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		
251.	NFPA and UL reports on testing and failure modes of lithium-ion batteries		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B, C		

Plaintiffs reserve the right to amend this list prior to trial. Plaintiffs further reserve the right to use any of the following:

1. Any and all discovery responses;
2. Any and all documents produced in discovery;
3. Any and all documents obtained through record subpoenas;
4. Any and all pleadings;
5. Any and all exhibits to be used for impeachment or rebuttal;
6. Any and all deposition transcripts or sworn testimony for any witness that has been provided in this case or in other matters;
7. Any and all demonstrative evidence necessary and/or pertaining to any expert witness opinions;
8. Any and all deposition exhibits;
9. Any and all exhibits identified by Defendants; and
10. Any and all documents from any expert files.

Following review of Plaintiffs’ Exhibit List, Defendants reserve the right to raise any additional objections following receipt of the physical exhibits.